

U.S. Department of Justice
United States Attorney
Eastern District of Michigan

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January 29, 2019

VIA FEDEX

Jeffrey G. Collins
Collins Legal
1323 Broadway Street, Suite 800
Detroit, MI 48226

Re: *United States v. Dr. Rajendra Bothra, et al.*
Criminal No. 18-cr-20800

Dear Counsel:

Enclosed please find a CD containing the government's first production of discovery materials in this matter. This discovery is subject to the protective order entered on January 19, 2019. Pursuant to Department of Justice policy, this disc is password protected. You will receive an email from our paralegal Christine Ouellette that contains the password necessary to access the materials on this disk. If you have any trouble accessing the information, please contact Christine Ouellette at 313-226-0289 or couellette1@usa.doj.gov.

The enclosed disk contains interview reports, investigative reports, search and seizure warrants, any statements by your client, criminal histories, billing data, and MAPS data. A detailed discovery index is enclosed for reference.

Please note this is an initial production and discovery will be produced or made available for review on a rolling basis. Search warrants were executed at the time of arrest and we will make available for production and/or inspection evidence seized during execution of those warrants, as appropriate. As previously discussed, there were approximately 1,000 boxes of patient charts seized, and we will determine how to best produce those or make them available for your inspection in the coming months.

Please also note that there are additional UC recordings of visits at the Pain Center that have not been produced. We are in the process of determine the total amount of data associate with these records and will be requesting that you provide to us a hard drive for uploading these recordings for production.

**NOTICE OF COMPLIANCE WITH FED. R. CRIM. P. 16
AND THE STANDING ORDER FOR DISCOVERY**

In providing you with the above materials, the United States has complied with Rule 16, Fed. R. Crim. P., and the Standing Order for Discovery and Inspection for the United States District Court for the Eastern District of Michigan.

In the event that additional discovery material comes into my possession, you will be notified and it will be made available to you.

DEMAND FOR RECIPROCAL DISCOVERY

At this time, the United States requests, pursuant to Rule 16(b)(1)(A) and (B), that the defendant permit the United States to inspect and copy or photograph:

(1) Books, papers, documents, data, photographs, tangible objects, buildings or places, or copies or portions of any of these items, which are within the possession, custody, or control of the defendant that the defendant intends to introduce as evidence-in-chief at the trial; and


(2) Any results or reports of physical or mental examinations and of scientific tests or experiments, or copies thereof within the possession or control of the defendant that the defendant intends to introduce as evidence-in-chief at the trial or that were prepared by a witness the defendant intends to call at trial when the results or reports relate to his testimony.

Please notify me as soon as possible if such documents, reports, etc., are available so that appropriate arrangements can be made. This is a continuing request, so that materials which are discovered in the future should be brought to the government's attention and appropriate arrangements may be made for review.

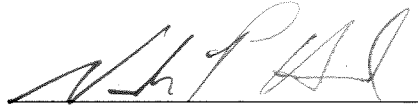
Thank you in advance for your continued attention to this matter. If you have any additional questions, please do not hesitate to contact me.

Respectfully,

MATTHEW SCHNEIDER
United States Attorney



Brandy R. McMillion
Assistant United States Attorney



Noah P. Hood
Assistant United States Attorney

/Enclosures